Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

### Filing at a Glance

Companies: Progressive Casualty Insurance Company, Progressive Classic Insurance Company, Progressive Direct Insurance Company, Progressive Northwestern Insurance Company, Progressive Specialty Insurance Company, United

Financial Casualty Company

Product Name: Personal Auto SERFF Tr Num: PRGS-125905775 State: Arkansas

TOI: 19.0 Personal Auto SERFF Status: Closed State Tr Num: EFT \$50

Sub-TOI: 19.0001 Private Passenger Auto Co Tr Num: L080924-AR-AU-A/D State Status: Fees verified and

(PPA) received

Filing Type: Form Co Status: Reviewer(s): Alexa Grissom, Betty

Montesi

Author: Pdpg 4 Disposition Date: 12/11/2008

Date Submitted: 12/10/2008 Disposition Status: Approved

Effective Date Requested (New): 03/18/2009 Effective Date (New): 03/18/2009

Effective Date Requested (Renewal): Effective Date (Renewal):

State Filing Description:

#### **General Information**

Project Name: Pet Injury Coverage Endorsement - Form Z538 (10/08) Status of Filing in Domicile: Pending

Project Number: L080924-AR-AU-A/D Domicile Status Comments:

Reference Organization: Reference Number:

Reference Title: Advisory Org. Circular:

Filing Status Changed: 12/11/2008

State Status Changed: 12/11/2008 Deemer Date:

Corresponding Filing Tracking Number:

Filing Description:

The Pet Injury Coverage Endorsement - Form Z538 (10/08) will replace the Pet Injury Coverage Endorsement - Form Z538 (05/07) that was approved for use on July 19, 2007, under your file # AR-PC-07-025460. The key changes to the endorsement are: 1) coverage is being increased from \$500 to \$1000, 2) the amount of the death benefit is \$1,000, regardless of the actual replacement cost of the pet; 3) coverage is being extended to stolen pets if the pet is inside a covered vehicle during the vehicle's theft; and 4) once the endorsement is added to a policy by purchasing Collision

Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

coverage, Pet Injury coverage will apply if the underlying loss is covered under Collision or Comprehensive coverage. A comparison document has been included to assist you in your review.

### **Company and Contact**

### **Filing Contact Information**

Corporate Law Department (440) 395-3756 [Phone] Mayfield Village, OH 44143 (440) 395-3790[FAX]

**Filing Company Information** 

Progressive Casualty Insurance Company CoCode: 24260 State of Domicile: Ohio

6300 Wilson Mills Road Group Code: 155 Company Type:
Mayfield Village, OH 44143 Group Name: State ID Number:

(440) 461-5000 ext. [Phone] FEIN Number: 34-6513736

-----

Progressive Classic Insurance Company CoCode: 42994 State of Domicile: Wisconsin

c/o CT Corporation Systems Group Code: 155 Company Type: Property and

Casualty

8025 Excelsior Dr, # 200

Madison, WI 53717 Group Name: State ID Number:

(608) 833-4821 ext. [Phone] FEIN Number: 39-1453002

-----

Progressive Direct Insurance Company CoCode: 16322 State of Domicile: Ohio

6300 Wilson Mills Rd, N72 Group Code: 155 Company Type: Cleveland, OH 44143 Group Name: State ID Number:

(440) 461-5000 ext. [Phone] FEIN Number: 34-1524319

-----

Progressive Northwestern Insurance Company CoCode: 42919 State of Domicile: Ohio

6300 Wilson Mills Road Group Code: 155 Company Type:
Mayfield Village, OH 44143 Group Name: State ID Number:

(440) 461-5000 ext. [Phone] FEIN Number: 91-1187829

\_\_\_\_\_

Progressive Specialty Insurance Company CoCode: 32786 State of Domicile: Ohio

6300 Wilson Mills Road Group Code: 155 Company Type:
Mayfield Village, OH 44143 Group Name: State ID Number:

Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

(440) 461-5000 ext. [Phone] FEIN Number: 34-1172685

-----

United Financial Casualty Company

6300 Wilson Mills Rd, N72

Mayfield Village, OH 44143-2182

(440) 461-5000 ext. [Phone]

CoCode: 11770 Group Code: 155

Group Name:

FEIN Number: 36-3298008

-----

State of Domicile: Ohio

Company Type:

Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

## **Filing Fees**

Fee Required? Yes
Fee Amount: \$50.00
Retaliatory? No

Fee Explanation:

Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Progressive Casualty Insurance Company	\$50.00	12/10/2008	24453803
Progressive Classic Insurance Company	\$0.00	12/10/2008	
Progressive Direct Insurance Company	\$0.00	12/10/2008	
Progressive Northwestern Insurance Company	\$0.00	12/10/2008	
Progressive Specialty Insurance Company	\$0.00	12/10/2008	
United Financial Casualty Company	\$0.00	12/10/2008	

Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

# **Correspondence Summary**

### **Dispositions**

Status	Created By	Created On	Date Submitted
Approved	Alexa Grissom	12/11/2008	12/11/2008

Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

### **Disposition**

Disposition Date: 12/11/2008

Effective Date (New): 03/18/2009

Effective Date (Renewal):

Status: Approved

Comment:

Rate data does NOT apply to filing.

**Overall Rate Information for Multiple Company Filings** 

Overall Percentage Rate Indicated For This Filing 0.000%

Overall Percentage Rate Impact For This Filing 0.000%

Effect of Rate Filing-Written Premium Change For This Program \$0

Effect of Rate Filing - Number of Policyholders Affected 0

Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

Item Type	Item Name	Item Status	Public Access
Supporting Document	Uniform Transmittal Document-Property & Approved		Yes
•			
Supporting Document	Comparison Document	Approved	Yes
Supporting Document	Readability Certificate	Approved	Yes
Supporting Document	Cover Letter	Approved	Yes
Form	Pet Injury Coverage Endorsement	Approved	Yes

Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

### Form Schedule

Review	Form Name	Form #	Edition	Form Type Action	Action Specific Readability	Attachment
Status			Date		Data	
Approved	Pet Injury	Z538	10/08	Endorseme Replaced	Replaced Form #:53.60	Z538.XX.100
	Coverage			nt/Amendm	Z538 (05/07)	8.1c.pdf
	Endorsement			ent/Conditi	Previous Filing #:	
				ons	AR-PC-07-	
					025460	

### **Pet Injury Coverage Endorsement**

Your policy is amended as follows:

If **you** have purchased Collision coverage for at least one **covered auto** under **your** policy, Pet Injury coverage is added to Part IV — Damage To A Vehicle.

#### **INSURING AGREEMENT – PET INJURY COVERAGE**

If **your pet** sustains injury or death while inside a **covered auto** or **non-owned auto** at the time of a loss covered under Collision or Comprehensive coverage, **we** will provide:

- 1. up to \$1,000 for reasonable and customary veterinary fees incurred by **you** or a **relative** if **your pet** is injured in, or as a direct result of, the covered loss; or
- 2. a \$1,000 death benefit if **your pet** dies in, or as a direct result of, the covered loss, less any payment **we** made toward veterinary expenses for **your pet**.

In the event of a covered loss due to the theft of a **covered auto** or **non-owned auto**, **we** will provide the death benefit provided **your pet** is inside that auto at the time of the theft and **your pet** is not recovered.

#### **ADDITIONAL DEFINITION**

The following definition applies to this coverage:

"Your pet" means any dog or cat owned by you or a relative.

#### **LIMITS OF LIABILITY**

The following additional Limits of Liability apply to Pet Injury coverage:

- 1. The most **we** will pay for all damages in any one loss is a total of \$1,000 regardless of the number of dogs or cats involved.
- 2. If **your pet** dies in, or as a direct result of, a covered loss, **we** will provide a death benefit of \$1,000, less any payment **we** made toward veterinary expenses for **your pet**.
- 3. No deductible shall apply to this coverage.

All other terms, limits and provisions of this policy remain unchanged.

Form Z538 (10/08)

Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

### **Rate Information**

Rate data does NOT apply to filing.

Company Tracking Number: L080924-AR-AU-A/D

TOI: 19.0 Personal Auto Sub-TOI: 19.0001 Private Passenger Auto (PPA)

Product Name: Personal Auto

Project Name/Number: Pet Injury Coverage Endorsement - Form Z538 (10/08)/L080924-AR-AU-A/D

## **Supporting Document Schedules**

**Review Status:** 

Satisfied -Name: Uniform Transmittal Document- Approved 12/11/2008

Property & Casualty

Comments:

Attachment:

industry\_rates\_PCtransDoc\_intelligent.pdf

**Review Status:** 

Satisfied -Name: Comparison Document Approved 12/11/2008

Comments: Attachment:

Z538.XX.1008.1r.pdf

**Review Status:** 

Satisfied -Name: Readability Certificate Approved 12/11/2008

Comments: Attachment:

Readability Certificate for Z538 (10-08).pdf

**Review Status:** 

Satisfied -Name: Cover Letter Approved 12/11/2008

Comments:

Attachment:

12-10-08 AR Z538 10-08 Cvr Ltr.pdf

# **Property & Casualty Transmittal Document**

1.	Reserved for Insurance	2. In:	surance De	epartment	Use only	
	Dept. Use Only	a. Da	te the filing	is received	:	
	b. Ana		alyst:			
		c. Dis	position:			
		d. Da	te of dispos	ition of the	filing:	
		e. Effe	ective date			
			New Bu			
		f Sta	Renewa te Filing #:	l Business		
				ш.		
			RFF Filing			
		」 h. Sul	oject Codes	5		
3.	Group Name					Group NAIC #
	•					•
4.	Company Name(s)		Domicile	NAIC #	FEIN#	State #
•						
5.	Company Tracking Number					
		Officer(s)	finclude to	oll-free numb	erl	
	Company Tracking Number stact Info of Filer(s) or Corporate Name and address	Officer(s)		oll-free numb	er] FAX #	e-mail
Con	tact Info of Filer(s) or Corporate				_ •	e-mail
Con	tact Info of Filer(s) or Corporate				_ •	e-mail
Con	tact Info of Filer(s) or Corporate				_ •	e-mail
6.	ntact Info of Filer(s) or Corporate  Name and address				_ •	e-mail
6. 7.	Name and address  Signature of authorized filer	Title			_ •	e-mail
7. 8.	Name and address  Signature of authorized filer  Please print name of authorized	Title ed filer	Tele	phone #s	FAX#	e-mail
7. 8.	Name and address  Signature of authorized filer	Title ed filer	Tele	phone #s	FAX#	e-mail
7. 8. Filii 9.	Signature of authorized filer Please print name of authorized information (see General I Type of Insurance (TOI) Sub-Type of Insurance (Sub	Title ed filer nstruction	Tele	phone #s	FAX#	e-mail
7. 8. Filli	Signature of authorized filer Please print name of authorized Type of Insurance (TOI) Sub-Type of Insurance (Sub-State Specific Product code	Title  ed filer  nstruction  o-TOI) (s)(if	s for descri	phone #s	FAX#	e-mail
7. 8. Filii 9.	Signature of authorized filer Please print name of authorized Type of Insurance (TOI) Sub-Type of Insurance (Sub State Specific Product code applicable)[See State Specific Required	Title  ed filer  nstruction  o-TOI)  (s)(if  uirements)	s for descri	phone #s	FAX#	e-mail
7. 8. Filii 9. 10.	Signature of authorized filer Please print name of authorized Type of Insurance (TOI) Sub-Type of Insurance (Sub-State Specific Product code	Title  ed filer  nstruction  o-TOI)  (s)(if  uirements)	s for descri	ptions of th	ese fields)	Rates/Rules
7. 8. Filli 9. 10. 11.	Signature of authorized filer Please print name of authorized Type of Insurance (TOI) Sub-Type of Insurance (Suk State Specific Product code applicable)[See State Specific Reg Company Program Title (Mar	Title  ed filer  nstruction  o-TOI)  (s)(if  uirements)	s for descri	ptions of th	ese fields)  [ ] Rules [ ] Rubination Rates/R	Rates/Rules ules/Forms
7. 8. Filli 9. 10. 11.	Signature of authorized filer Please print name of authorized Type of Insurance (TOI) Sub-Type of Insurance (Suk State Specific Product code applicable)[See State Specific Reg Company Program Title (Mar	Title  ed filer  nstruction  o-TOI)  (s)(if  uirements)	s for descri	ptions of th	ese fields)	Rates/Rules ules/Forms
7. 8. Filli 9. 10. 11.	Signature of authorized filer Please print name of authorized Type of Insurance (TOI) Sub-Type of Insurance (Suk State Specific Product code applicable)[See State Specific Reg Company Program Title (Mar	Title  ed filer  nstruction  o-TOI)  (s)(if  juirements)  keting title)	s for descri	ptions of th	ese fields)  [ ] Rules [ ] Rubination Rates/R	Rates/Rules ules/Forms ription)
7. 8. Filii 9. 10. 11. 12. 13.	Signature of authorized filer Please print name of authorized In the state of authorized filer Please print name of authorized In the state of authorized filer In th	ed filer nstruction o-TOI) (s)(if uirements) keting title)	s for descri	ptions of th	ese fields)  [ ] Rules [ ] Rubination Rates/Rubiner (give descriptions)	Rates/Rules ules/Forms ription)
7. 8. Filii 9. 10. 11. 12. 13.	Signature of authorized filer Please print name of authorized In the second of the sec	Title  ed filer  nstruction  o-TOI) (s)(if  uirements] keting title)	s for descri	ptions of th	ese fields)  [ ] Rules [ ] Rubination Rates/Rubiner (give descriptions)	Rates/Rules ules/Forms ription)
7. 8. Filii 9. 10. 11. 12. 13.	Signature of authorized filer Please print name of authorized filer Please print name of authorized filer Please print name of authorized filer Type of Insurance (TOI) Sub-Type of Insurance (Sub State Specific Product code applicable)[See State Specific Reg Company Program Title (Mar Filing Type  Effective Date(s) Requested Reference Filing? Reference Organization (if a Reference Organization # &	Title  ed filer  nstruction  o-TOI) (s)(if  uirements] keting title)	s for descri	ptions of th	ese fields)  [ ] Rules [ ] Rubination Rates/Rubiner (give descriptions)	Rates/Rules ules/Forms ription)
7. 8. Filii 9. 10. 11. 12. 13.	Signature of authorized filer Please print name of authorized In the second of the sec	Title  ed filer  nstruction  o-TOI) (s)(if  uirements] keting title)	s for descri	ptions of th	ese fields)  [ ] Rules [ ] Rubination Rates/Rubination Ra	Rates/Rules ules/Forms ription)

# **Property & Casualty Transmittal Document—**

20.	This filing transmittal is part of Company Tracking #
21.	Filing Description [This area can be used in lieu of a cover letter or filing memorandum and is free-form text]
<b>Z</b> 1.	Timing Description [This area can be used in field of a cover letter of filling memorandum and is free-form text]
	Filing Fees (Filer must provide check # and fee amount if applicable)
22.	[If a state requires you to show how you calculated your filing fees, place that calculation below]
01	
	neck #: mount:
AI	nount.
	r to each state's checklist for additional state specific requirements or instructions on ulating fees.
	Refer to the each state's checklist for additional state specific requirements (i.e. # of additional copies uired, other state specific forms, etc.)
PC <sup>-</sup>	ΓD-1 pg 2 of 2

# FORM FILING SCHEDULE

(This form must be provided ONLY when making a filing that includes forms) (Do <u>not</u> refer to the body of the filing for the forms listing, unless allowed by state.)

1.	This filing transmittal is part of Company Tracking #	
2.	This filing corresponds to rate/rule filing number (Company tracking number of rate/rule filing, if applicable)	

3.	Form Name /Description/Synopsis	Form # Include edition date	Replacement Or withdrawn?	If replacement, give form # it replaces	Previous state filing number, if required by state
01			[ ] New [ ] Replacement [ ] Withdrawn		
02			[ ] New [ ] Replacement [ ] Withdrawn		
03			[ ] New [ ] Replacement [ ] Withdrawn		
04			[ ] New [ ] Replacement [ ] Withdrawn		
05			[ ] New [ ] Replacement [ ] Withdrawn		
06			[ ] New [ ] Replacement [ ] Withdrawn		
07			[ ] New [ ] Replacement [ ] Withdrawn		
08			[ ] New [ ] Replacement [ ] Withdrawn		
09			[ ] New [ ] Replacement [ ] Withdrawn		
10			[ ] New [ ] Replacement [ ] Withdrawn		

PC FFS-1

### **Pet Injury Coverage Endorsement**

**Your** Auto-policy is amended as follows:

If **you** have purchased Collision coverage for at least one **covered auto** under **your** policy, The following Pet Injury c€overage is added to Part IV − Damage To A Vehicle.÷

#### **INSURING AGREEMENT – PET INJURY COVERAGE**

If **you** have purchased Collision Coverage for at least one **covered auto** under **your** policy and **your** pet sustains injury or death while inside a <u>as a result of a **collision** involving any **covered auto** or **non-owned auto** at the time of a loss covered under Collision or Comprehensive coverage, **we** will provide <del>pay up to \$500 for</del>:</u>

- 1. up to \$1,000 for reasonable and customary veterinary fees<del>costs</del> incurred by **you** or a **relative** if **your pet** is injured in, or as a direct result of, the covered loss<del>for veterinary fees arising from such **collision**; or</del>
- 2. a \$1,000 death benefit your pet's replacement cost if your pet dies in, or as a direct result of, the covered loss, less any payment we made toward veterinary expenses for your pet the accident.

In the event of a covered loss due to the theft of a Pet Injury Coverage applies only if **your pet** is inside the **covered auto** or **non-owned auto**, **we** will provide the death benefit provided **your pet** is inside that auto at the time of the theft and **your pet** is not recovered **collision**.

#### **ADDITIONAL DEFINITIONS**

The following definitions applies apply to this coverage:

- 1.—"Your pet" means any dog or cat owned by you or a relative.
- 2. "Your pet's replacement cost" means the cost to replace the deceased dog or cat with one of like kind and quality. It does not include any amounts for veterinary bills, training, or any other amounts other than the cost to replace the pet itself.

#### **EXCLUSION**

Pet Injury Coverage will not apply if loss to the vehicle carrying your pet is excluded under Part IV of your policy.

### **LIMITS OF LIABILITY**

The following additional Limits of Liability apply to Pet Injury coverage:

- 1. The most **we** will pay for all damages <del>under Pet Injury Coverage with respect to</del>in any one loss<del>accident</del> is a total of \$1,000<del>500</del> regardless of the number of dogs or cats involved.<del>that are injured or die in that accident. The following additional provisions apply:</del>
- 1. If **your pet** is injured as a result of a covered accident, **we** will pay for all necessary medications and procedures prescribed by **your pet's** veterinarian for treatment of such covered injury.
- If your pet dies in, or as a direct result of, a covered lossaccident, we will provide a death benefit of \$1,000, less
  any payment we made toward veterinary expenses forpay your pet's replacement cost whether your pet-is
  actually replaced or not.
- 3. No deductible shall apply to this coverage.

All other terms, limits and provisions of this policy remain unchanged.

Form Z538 (10/08<del>05/07</del>)



Date: December 10, 2008

# READABILITY CERTIFICATE

We, Kathleen M. Cerny, Assistant Secretary of Progressive Casualty, Classic, Northwestern and Specialty Insurance Companies; Karen A. Kosuda, Assistant Secretary of Progressive Direct Insurance Company; and Margaret A. Rose, Assistant Secretary of United Financial Casualty Company, certify that the Pet Injury Coverage Endorsement - Form Z538 (10/08) achieved a score of 53.6 and complies with the readability requirements of the State of Arkansas when tested in accordance with the Flesch Reading Ease Test.

Kathleen M. Cerny

**Assistant Secretary** 

Progressive Casualty Insurance Company

athleen M. Cerny

Progressive Classic Insurance Company

Progressive Northwestern Insurance Company

. A. Dosus

Progressive Specialty Insurance Company

Karen A. Kosuda

**Assistant Secretary** 

Progressive Direct Insurance Company

largaret a. Rose

Margaret A. Rose

**Assistant Secretary** 

United Financial Casualty Company



December 10, 2008

#### **FILED VIA SERFF**

Arkansas Insurance Department 1200 West 3<sup>rd</sup> Street Little Rock, AR 72201-1904

RE: Form Filing - 19.0001 Private Passenger Auto (PPA) - Our File # L080924-AR-AU-A/D

PROGRESSIVE CASUALTY INSURANCE COMPANY
PROGRESSIVE CLASSIC INSURANCE COMPANY
PROGRESSIVE DIRECT INSURANCE COMPANY
PROGRESSIVE NORTHWESTERN INSURANCE COMPANY
PROGRESSIVE SPECIALTY INSURANCE COMPANY
UNITED FINANCIAL CASUALTY COMPANY
(NAIC # 155-24260)
(NAIC # 155-16322)
(NAIC # 155-32786)
(NAIC # 155-32786)

Pet Injury Coverage Endorsement - Form Z538 (10/08)

SERFF Tracking # PRGS-125905775

Included in this filing is the above-referenced form for your review and approval. The date we propose to begin using this form is March 18, 2009. We will notify you if this date changes. This form does not affect rates.

The Pet Injury Coverage Endorsement - Form Z538 (10/08) will replace the Pet Injury Coverage Endorsement - Form Z538 (05/07) that was approved for use on July 19, 2007, under your file # AR-PC-07-025460. The key changes to the endorsement are: 1) coverage is being increased from \$500 to \$1000, 2) the amount of the death benefit is \$1,000, regardless of the actual replacement cost of the pet; 3) coverage is being extended to stolen pets if the pet is inside a covered vehicle during the vehicle's theft; and 4) once the endorsement is added to a policy by purchasing Collision coverage, Pet Injury coverage will apply if the underlying loss is covered under Collision or Comprehensive coverage. A comparison document has been included to assist you in your review.

Also included are the required NAIC Property & Casualty Transmittal and a Readability Certificate for this form. The filing fee of \$50.00 is being submitted via EFT in SERFF.

If you have any questions or want to discuss this filing further, please call me at 1-800-321-9843, network extension 625-3756. Thank you for your attention to this filing.

Sincerely,

Jeanine Duda

Senior Policy Form Specialist

Direct: (440) 395-3756 FAX: (440) 395-3790

Email: Jeanine M Duda@progressive.com

JMD/aml